Remarks

The Office Action mailed November 6, 2003 has been carefully reviewed and the foregoing amendment has been made in consequence thereof.

Claims 1-9, 11, and 13-26 are pending in this application. Claims 1-9, 11, and 13-26 stand rejected. Claims 10 and 12 have been cancelled.

In accordance with 37 C.F.R. 1.136(a), a one-month extension of time is submitted herewith to extend the due date of the response to the Office Action dated November 6, 2003 for the above-identified patent application from February 6, 2004 through and including March 6, 2004. In accordance with 37 C.F.R. 1.17(a)(2), authorization to charge a deposit account in the amount of $110.00 to cover this extension of time request also is submitted herewith.

The rejection of Claims 1-9, 11, 13-21, and 24 under 35 U.S.C. § 103(a) as being unpatentable over Lee et al. (U.S. 2002/0072951) ("Lee") in view of Thearling (U.S. Patent No. 6, 240,411) is respectfully traversed.

Applicants respectfully submit that neither Lee nor Thearling, considered alone or in combination, describe or suggest the claimed invention. As discussed below, neither Lee nor Thearling, considered alone or in combination, describe or suggest a method of analyzing the success of a marketing campaign that includes using a targeting engine to determine a sequential order for combining models, and combining the models embedded within the targeting engine in the determined sequential order to define an initial customer group that includes a list of customers satisfying each of the combined models and rank ordered by projected profitability wherein projected profitability is based on at least one of a probable response by a customer to the marketing campaign, attrition of the customer, and risk associated with the customer.

Furthermore, neither Lee nor Thearling, considered alone or in combination, describe or suggest an initial customer group list that has a high profit end, a moderate profit section, and a low profit end, wherein the high profit end includes customers having a highest projected profitability, the low profit end includes customers having a lowest projected profitability, and

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the moderate profit section includes a profitability baseline, wherein the determined sequential order maximizes a number of customers included between the high profit end and the profitability baseline, and wherein the target group includes the customers included between the high profit end of the list and the profitability baseline.

Moreover, neither Lee nor Thearling, considered alone or in combination, describe or suggest deriving a list of user defined dimensions for the customers included in the target group wherein the user defined dimensions include marketing defined dimensions and risk defined dimensions, profiling results of the marketing campaign against the marketing defined dimensions and the risk defined dimensions, and assigning a score to the results of the marketing campaign based on the marketing defined dimensions and the risk defined dimensions.

Lee describes a method of a program product for collecting, analyzing, and presenting data by extracting input data from an input database. The input data is then transformed into a suitable schema for subsequent analysis, followed by subsequent analysis of the extracted and transformed data, and presentation of the analyzed, transformed, extracted data.

Thearling describes a method and apparatus for classifying a plurality of records in a database (10) that includes providing a first model (16) for ascertaining a first characteristic of each of the records, forming a query that includes a reference to first model (16), using the reference to execute first model (16) to generate a score for the first characteristic of at least one of the plurality of records, and selecting a selected set of the records wherein each record of the selected set satisfies the selection criteria. Thearling also describes a dynamic evaluation of a database where multiple models may be included within a query (col. 13, lines 21-23). In one embodiment, a campaign manager could automatically select the order of the models for evaluation, for example, the order could be selected based on the computation time of scoring a particular model (col. 13, lines 37-43).

Claim 1 recites a method of analyzing the success of a marketing campaign by using a targeting engine, campaign results and an original campaign database, the method includes "embedding within the targeting engine a plurality of analytic models including marketing and

risk models...using the targeting engine to determine a sequential order for combining the models...combining the models embedded within the targeting engine in the determined sequential order to define an initial customer group including a list of customers satisfying each of the combined models and rank ordered by projected profitability wherein projected profitability is based on at least one of a probable response by a customer to the marketing campaign, attrition of the customer, and risk associated with the customer, the list includes a high profit end, a moderate profit section, and a low profit end, the high profit end including customers having a highest projected profitability, the low profit end including customers having a lowest projected profitability, the moderate profit section including a profitability baseline, wherein the determined sequential order maximizes a number of customers included between the high profit end and the profitability baseline, the target group includes the customers included between the high profit end of the list and the profitability baseline, the profitability baseline defines marginal returns for a customer equal to zero...deriving a list of user defined dimensions for the customers included in the target group, the user defined dimensions include marketing defined dimensions and risk defined dimensions...profiling results of the marketing campaign against the marketing defined dimensions and the risk defined dimensions...and assigning a score to the results of the marketing campaign based on the marketing defined dimensions and the risk defined dimensions."

Neither Lee nor Thearling, considered alone or in combination, describe or suggest a method of analyzing the success of a marketing campaign that includes using a targeting engine to determine a sequential order for combining models, and combining the models embedded within the targeting engine in the determined sequential order to define an initial customer group that includes a list of customers satisfying each of the combined models and rank ordered by projected profitability wherein projected profitability is based on at least one of a probable response by a customer to the marketing campaign, attrition of the customer, and risk associated with the customer.

Furthermore, neither Lee nor Thearling, considered alone or in combination, describe or suggest an initial customer group list that has a high profit end, a moderate profit section, and a

low profit end, wherein the high profit end includes customers having a highest projected profitability, the low profit end includes customers having a lowest projected profitability, and the moderate profit section includes a profitability baseline, wherein the determined sequential order maximizes a number of customers included between the high profit end and the profitability baseline, and wherein the target group includes the customers included between the high profit end of the list and the profitability baseline.

Moreover, neither Lee nor Thearling, considered alone or in combination, describe or suggest deriving a list of user defined dimensions for the customers included in the target group wherein the user defined dimensions include marketing defined dimensions and risk defined dimensions, profiling results of the marketing campaign against the marketing defined dimensions and the risk defined dimensions, and assigning a score to the results of the marketing campaign based on the marketing defined dimensions and the risk defined dimensions.

Rather, Lee describes a method for collecting, analyzing, and presenting data by extracting input data from an input database such that the input data is then transformed into a suitable schema for subsequent analysis, followed by subsequent analysis of the extracted and transformed data, and presentation of the analyzed, transformed, extracted data; and Thearling describes a method and apparatus for classifying a plurality of records in a database that includes forming a query that includes a reference to a first model, and using the reference to execute the first model to generate a score for the first characteristic of at least one of the plurality of records in a database.

As acknowledged by the Office Action at page 3, Lee does not disclose "using the targeting engine to determine a sequential order for combining the models; combining the models embedded within the targeting engine in the determined sequential order, and assigning a score to the results of the marketing campaign based on the marketing defined dimensions and risk defined dimensions." Moreover, Lee does not describe or suggest combining the models embedded within the targeting engine in the determined sequential order to define an initial customer group that includes a list of customers satisfying each of the combined models and rank ordered by projected profitability wherein projected profitability is based on at least one of a

probable response by a customer to the marketing campaign, attrition of the customer, and risk associated with the customer. Lee also does not describe or suggest an initial customer group list that has a high profit end, a moderate profit section, and a low profit end, wherein the high profit end includes customers having a highest projected profitability, the low profit end includes customers having a lowest projected profitability, and the moderate profit section includes a profitability baseline, wherein the determined sequential order maximizes a number of customers included between the high profit end and the profitability baseline, and wherein the target group includes the customers included between the high profit end of the list and the profitability baseline.

The Office Action suggests at pages 2 and 3 that Lee describes "embedding within the targeting engine a plurality of analytical models (i.e., marketing analysis models, see para. 0030) including marketing (i.e., customer/product analysis, see para. 0031 and 0032) and risk models (targeting most valuable customers, i.e., ones of low risk and high return, see para. 0039); combining the models embedded within the targeting engine to derive a list of user defined dimensions". Applicants respectfully traverse this suggestion. In fact, Applicants respectfully submit that Lee does not describe nor teach using models to analyze the success of a marketing campaign, embedding a plurality of models in a targeting engine, or using the models to derive a list of user defined dimensions. Rather, Lee describes a data mart and a data mart builder for collecting, analyzing, and presenting data by extracting input data from an input database (para. 0024). Although Lee describes in paragraph 0030 pre-built marketing analyses that can be organized into categories, Lee does not describe, teach or mention using models to analyze the success of a marketing campaign.

Moreover, although Lee mentions at para. 0039 that "Measuring customer profitability and lifetime value is just one example of the applicability of the method and program product of the invention", Lee does not describe or suggest embedding within a targeting engine a plurality of analytic models including marketing and risk models. Furthermore, in contrast to what has been suggested by the Office Action, Applicants submit that measuring customer profitability

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and lifetime value does not constitute the use of risk models as described in the present invention.

The Office Action also indicates at page 3 that Thearling discloses "the campaign manager automatically selecting the order of the models for analysis (see figure 11 and column 13, lines 38-41)." Although Thearling discusses that, in one embodiment, the campaign manager could automatically select the order of models for evaluation, Thearling does not describe or suggest combining the models embedded within the targeting engine in the determined sequential order to define an initial customer group that includes a list of customers satisfying each of the combined models and rank ordered by projected profitability wherein projected profitability is based on at least one of a probable response by a customer to the marketing campaign, attrition of the customer, and risk associated with the customer. Moreover, Thearling does not describe or suggest an initial customer group list that has a high profit end, a moderate profit section, and a low profit end, wherein the high profit end includes customers having a highest projected profitability, the low profit end includes customers having a lowest projected profitability, and the moderate profit section includes a profitability baseline, wherein the determined sequential order maximizes a number of customers included between the high profit end and the profitability baseline, and wherein the target group includes the customers included between the high profit end of the list and the profitability baseline. Rather, Thearling describes the campaign manager automatically selecting the order of models based on the computation time of scoring a particular model.

Furthermore, Thearling does not describe or suggest deriving a list of user defined dimensions for the customers included in the target group wherein the user defined dimensions include marketing defined dimensions and risk defined dimensions, profiling results of the marketing campaign against the marketing defined dimensions and the risk defined dimensions, and assigning a score to the results of the marketing campaign based on the marketing defined dimensions and the risk defined dimensions. Rather, Thearling describes a method and apparatus for classifying a plurality of records in a database that includes forming a query that includes a reference to a first model, and using the reference to execute the first model to

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generate a score for the first characteristic of at least one of the plurality of records in a database. In contrast to the present invention, the "score" that is described in Thearling is not assigned to the results of a marketing campaign based on marketing defined dimensions and risk defined dimensions. Rather, Thearling describes a score that is generated when a model is applied to a record in a database (Thearling, col. 8, lines 31-32). Accordingly, Applicants respectfully submit that Claim 1 is patentable over Lee in view of Thearling.

For at least the reasons set forth above, Applicants respectfully request that the 35 U.S.C. § 103(a) rejection of Claim 1 be withdrawn.

Claims 2-9 and 21 depend, directly or indirectly, from independent Claim 1. When the recitations of Claims 2-9 and 21 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claims 2-9 and 21 likewise are patentable over Lee in view of Thearling.

Claim 11 recites a system for analyzing success of a marketing campaign that includes a customer database having campaign results and an original campaign database, a graphical user interface for presentation of campaign analysis data, and a plurality of analytic models including marketing and risk models embedded within a targeting engine, wherein the system is configured to "determine a sequential order for combining the models...combine the models in the determined sequential order to define an initial customer group, the initial customer group includes a list of customers satisfying each of the combined models and rank ordered by projected profitability wherein projected profitability is based on at least one of a probable response by a customer to the marketing campaign, attrition of the customer, and risk associated with the customer, the list includes a high profit end, a moderate profit section, and a low profit end, the high profit end including customers having a highest projected profitability, the low profit end including customers having a lowest projected profitability, the moderate profit section including a profitability baseline, wherein the determined sequential order maximizes a number of customers included between the high profit end and the profitability baseline, the target group includes the customers included between the high profit end of the list and the profitability baseline, the profitability baseline defines marginal returns for a customer equal to

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zero...derive a list of user defined dimensions including marketing defined dimensions and risk defined dimensions for generating a marketing campaign for the customers included in the target group...profile results of the marketing campaign against said marketing defined dimensions and said risk defined dimensions...and assign a score to the results of the marketing campaign based on said marketing defined dimensions and said risk defined dimensions."

Neither Lee nor Thearling, considered alone or in combination, describe or suggest a system for analyzing success of a marketing campaign that is configured to determine a sequential order for combining models, and combine the models in the determined sequential order to define an initial customer group that includes a list of customers satisfying each of the combined models and rank ordered by projected profitability wherein projected profitability is based on at least one of a probable response by a customer to the marketing campaign, attrition of the customer, and risk associated with the customer.

Furthermore, neither Lee nor Thearling, considered alone or in combination, describe or suggest an initial customer group list that has a high profit end, a moderate profit section, and a low profit end, wherein the high profit end includes customers having a highest projected profitability, the low profit end includes customers having a lowest projected profitability, and the moderate profit section includes a profitability baseline, wherein the determined sequential order maximizes a number of customers included between the high profit end and the profitability baseline, and wherein the target group includes the customers included between the high profit end of the list and the profitability baseline.

Moreover, neither Lee nor Thearling, considered alone or in combination, describe or suggest a system configured to derive a list of user defined dimensions that includes marketing defined dimensions and risk defined dimensions for generating a marketing campaign for the customers included in the target group, profile results of the marketing campaign against the marketing defined dimensions and the risk defined dimensions, and assign a score to the results of the marketing campaign based on the marketing defined dimensions and the risk defined dimensions.

Rather, Lee describes a method for collecting, analyzing, and presenting data by extracting input data from an input database such that the input data is then transformed into a suitable schema for subsequent analysis, followed by subsequent analysis of the extracted and transformed data, and presentation of the analyzed, transformed, extracted data; and Thearling describes a method and apparatus for classifying a plurality of records in a database that includes forming a query that includes a reference to a first model, and using the reference to execute the first model to generate a score for the first characteristic of at least one of the plurality of records in a database. Accordingly, Applicants respectfully submit that Claim 11 is patentable over Lee in view of Thearling.

For at least the reasons set forth above, Applicants respectfully request that the 35 U.S.C. § 103(a) rejection of Claim 11 be withdrawn.

Claims 13-20 and 24 depend, directly or indirectly, from independent Claim 11. When the recitations of Claims 13-20 and 24 are considered in combination with the recitations of Claim 11, Applicants submit that dependent Claims 13-20 and 24 likewise are patentable over Lee in view of Thearling.

For at least the reasons set forth above, Applicants respectfully request that the 35 U.S.C. § 103(a) rejection of Claims 1-9, 11, 13-21, and 24 be withdrawn.

The rejection of Claims 22, 23, 25, and 26 under 35 U.S.C. § 103(a) as being unpatentable over Lee et al. (U.S. 2002/0072951) ("Lee") in view of Thearling (U.S. Patent No. 6, 240,411) is respectfully traversed.

Lee and Thearling are both described above.

Claims 22 and 23 depend from independent Claim 1. Claim 1 recites a method of analyzing the success of a marketing campaign by using a targeting engine, campaign results and an original campaign database, the method includes "embedding within the targeting engine a plurality of analytic models including marketing and risk models...using the targeting engine to determine a sequential order for combining the models...combining the models embedded within

the targeting engine in the determined sequential order to define an initial customer group including a list of customers satisfying each of the combined models and rank ordered by projected profitability wherein projected profitability is based on at least one of a probable response by a customer to the marketing campaign, attrition of the customer, and risk associated with the customer, the list includes a high profit end, a moderate profit section, and a low profit end, the high profit end including customers having a highest projected profitability, the low profit end including customers having a lowest projected profitability, the moderate profit section including a profitability baseline, wherein the determined sequential order maximizes a number of customers included between the high profit end and the profitability baseline, the target group includes the customers included between the high profit end of the list and the profitability baseline, the profitability baseline defines marginal returns for a customer equal to zero…deriving a list of user defined dimensions for the customers included in the target group, the user defined dimensions include marketing defined dimensions and risk defined dimensions…profiling results of the marketing campaign against the marketing defined dimensions and the risk defined dimensions…and assigning a score to the results of the marketing campaign based on the marketing defined dimensions and the risk defined dimensions."

Neither Lee nor Thearling, considered alone or in combination, describe or suggest a method of analyzing the success of a marketing campaign that includes using a targeting engine to determine a sequential order for combining models, and combining the models embedded within the targeting engine in the determined sequential order to define an initial customer group that includes a list of customers satisfying each of the combined models and rank ordered by projected profitability wherein projected profitability is based on at least one of a probable response by a customer to the marketing campaign, attrition of the customer, and risk associated with the customer.

Furthermore, neither Lee nor Thearling, considered alone or in combination, describe or suggest an initial customer group list that has a high profit end, a moderate profit section, and a low profit end, wherein the high profit end includes customers having a highest projected

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profitability, the low profit end includes customers having a lowest projected profitability, and the moderate profit section includes a profitability baseline, wherein the determined sequential order maximizes a number of customers included between the high profit end and the profitability baseline, and wherein the target group includes the customers included between the high profit end of the list and the profitability baseline.

Moreover, neither Lee nor Thearling, considered alone or in combination, describe or suggest deriving a list of user defined dimensions for the customers included in the target group wherein the user defined dimensions include marketing defined dimensions and risk defined dimensions, profiling results of the marketing campaign against the marketing defined dimensions and the risk defined dimensions, and assigning a score to the results of the marketing campaign based on the marketing defined dimensions and the risk defined dimensions.

Rather, Lee describes a method for collecting, analyzing, and presenting data by extracting input data from an input database such that the input data is then transformed into a suitable schema for subsequent analysis, followed by subsequent analysis of the extracted and transformed data, and presentation of the analyzed, transformed, extracted data; and Thearling describes a method and apparatus for classifying a plurality of records in a database that includes forming a query that includes a reference to a first model, and using the reference to execute the first model to generate a score for the first characteristic of at least one of the plurality of records in a database.

The Office Action provides at page 6 that the Examiner "takes Official Notice that all of these types of marketing and risk models are variations that could be implemented in any marketing analysis system. Applicants respectfully traverse the Official Notice taken by the Examiner. Although the Examiner suggests that the marketing and risk models recited in Claims 22 and 23 are merely variations of one another, the Examiner has failed to provide any support for such a position. Moreover, these marketing and risk models are described in detail on pages 3 and 4 of the originally filed patent application. In contrast to what has been suggested by the Office Action, the description of each of these models clearly shows that these models are not merely variations of one another, but rather are different models that predict different customer

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metrics. Accordingly, Applicants respectfully submit that Claim 1 is patentable over Lee in view of Thearling.

When the recitations of Claims 22 and 23 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claims 22 and 23 likewise are patentable over Lee in view of Thearling.

Claims 25 and 26 depend from independent Claim 11. Claim 11 recites a system for analyzing success of a marketing campaign that includes a customer database having campaign results and an original campaign database, a graphical user interface for presentation of campaign analysis data, and a plurality of analytic models including marketing and risk models embedded within a targeting engine, wherein the system is configured to "determine a sequential order for combining the models...combine the models in the determined sequential order to define an initial customer group, the initial customer group includes a list of customers satisfying each of the combined models and rank ordered by projected profitability wherein projected profitability is based on at least one of a probable response by a customer to the marketing campaign, attrition of the customer, and risk associated with the customer, the list includes a high profit end, a moderate profit section, and a low profit end, the high profit end including customers having a highest projected profitability, the low profit end including customers having a lowest projected profitability, the moderate profit section including a profitability baseline, wherein the determined sequential order maximizes a number of customers included between the high profit end and the profitability baseline, the target group includes the customers included between the high profit end of the list and the profitability baseline, the profitability baseline defines marginal returns for a customer equal to zero...derive a list of user defined dimensions including marketing defined dimensions and risk defined dimensions for generating a marketing campaign for the customers included in the target group...profile results of the marketing campaign against said marketing defined dimensions and said risk defined dimensions...and assign a score to the results of the marketing campaign based on said marketing defined dimensions and said risk defined dimensions."

Neither Lee nor Thearling, considered alone or in combination, describe or suggest a system for analyzing success of a marketing campaign that is configured to determine a sequential order for combining models, and combine the models in the determined sequential order to define an initial customer group that includes a list of customers satisfying each of the combined models and rank ordered by projected profitability wherein projected profitability is based on at least one of a probable response by a customer to the marketing campaign, attrition of the customer, and risk associated with the customer.

Furthermore, neither Lee nor Thearling, considered alone or in combination, describe or suggest an initial customer group list that has a high profit end, a moderate profit section, and a low profit end, wherein the high profit end includes customers having a highest projected profitability, the low profit end includes customers having a lowest projected profitability, and the moderate profit section includes a profitability baseline, wherein the determined sequential order maximizes a number of customers included between the high profit end and the profitability baseline, and wherein the target group includes the customers included between the high profit end of the list and the profitability baseline.

Moreover, neither Lee nor Thearling, considered alone or in combination, describe or suggest a system configured to derive a list of user defined dimensions that includes marketing defined dimensions and risk defined dimensions for generating a marketing campaign for the customers included in the target group, profile results of the marketing campaign against the marketing defined dimensions and the risk defined dimensions, and assign a score to the results of the marketing campaign based on the marketing defined dimensions and the risk defined dimensions.

Rather, Lee describes a method for collecting, analyzing, and presenting data by extracting input data from an input database such that the input data is then transformed into a suitable schema for subsequent analysis, followed by subsequent analysis of the extracted and transformed data, and presentation of the analyzed, transformed, extracted data; and Thearling describes a method and apparatus for classifying a plurality of records in a database that includes forming a query that includes a reference to a first model, and using the reference to execute the

first model to generate a score for the first characteristic of at least one of the plurality of records in a database.

The Office Action provides at page 6 that the Examiner "takes Official Notice that all of these types of marketing and risk models are variations that could be implemented in any marketing analysis system. Applicants respectfully traverse the Official Notice taken by the Examiner. Although the Examiner suggests that the marketing and risk models recited in Claims 25 and 26 are merely variations of one another, the Examiner has failed to provide any support for such a position. Moreover, these marketing and risk models are described in detail on pages 3 and 4 of the originally filed patent application. In contrast to what has been suggested by the Office Action, the description of each of these models clearly shows that these models are not merely variations of one another, but rather are different models that predict different customer metrics. Accordingly, Applicants respectfully submit that Claim 1 is patentable over Lee in view of Thearling. Accordingly, Applicants respectfully submit that dependent Claims 25 and 26 are patentable over Lee in view of Thearling.

When the recitations of Claims 25 and 26 are considered in combination with the recitations of Claim 11, Applicants submit that dependent Claims 25 and 26 likewise are patentable over Lee in view of Thearling and further in view of Lazarus.

For at least the reasons set forth above, Applicants respectfully request that the 35 U.S.C. § 103(a) rejection of Claims 22, 23, 25, and 26 be withdrawn.

Notwithstanding the above, the rejection of Claims 1-9, 11, 13-21, and 24, and the rejection of Claims 22, 23, 25, and 26 under 35 U.S.C. § 103(a) as being unpatentable over Lee in view of Thearling is further traversed on the grounds that the Section 103 rejection of the presently pending claims is not a proper rejection. Obviousness cannot be established by merely suggesting that it would have been obvious to one of ordinary skill in the art to modify Lee using the teachings of Thearling. More specifically, as is well established, obviousness cannot be established by combining the teachings of the cited art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combination. Neither Lee nor Thearling

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describe or suggest the claimed combination. Furthermore, in contrast to the assertion within the Office Action, Applicants respectfully submit that it would not be obvious to one skilled in the art to combine Lee with Thearling because there is no motivation to combine the references suggested in the art. Rather, the Examiner has not pointed to any prior art that teaches or suggests to combine the disclosures, other than Applicants' own teaching.

More specifically, neither Lee nor Thearling describe or suggest the claimed invention. Rather, Lee teaches a method of a program product for collecting, analyzing, and presenting data by extracting input data from an input database. Thearling describes a method and apparatus for classifying a plurality of records in a database. Combining Lee with the teachings of Thearling would not describe or suggest the present invention. Accordingly, Applicants respectfully submit that there is no suggestion or motivation to combine Lee with Thearling.

As the Federal Circuit has recognized, obviousness is not established merely by combining references having different individual elements of pending claims. Ex parte Levengood, 28 U.S.P.Q.2d 1300 (Bd. Pat. App. & Inter. 1993). MPEP 2143.01. Rather, there must be some suggestion, outside of Applicants' disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicants' disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion or motivation to combine the prior art disclosures, nor any reasonable expectation of success has been shown.
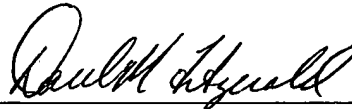
Furthermore, it is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the cited art so that the claimed invention is rendered obvious. Specifically, one cannot use hindsight reconstruction to pick and choose among isolated disclosures in the art to deprecate the claimed invention. Further, it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art. The present Section 103 rejection is based on a combination of teachings selected from multiple patents in an attempt to arrive at the claimed invention. Since there is no teaching nor suggestion in the cited art for the claimed

combination, the Section 103 rejection appears to be based on a hindsight reconstruction in which isolated disclosures have been picked and chosen in an attempt to deprecate the present invention. Of course, such a combination is impermissible, and for this reason alone, Applicants respectfully request that the Section 103 rejection be withdrawn.

For at least the reasons set forth above, Applicants respectfully request that the 35 U.S.C. § 103(a) rejection of Claims 1-9, 11, 13-21, and 24, and the rejection of Claims 22, 23, 25, and 26 be withdrawn.

In view of the foregoing amendments and remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully Submitted,

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